

816 Congress Avenue, Suite 1900 Austin, Texas 78701 512.322.5800 p 512.472.0532 f

lglawfirm.com

Mr. Norton's Direct Line: (512) 322-5884 Email: dnorton@lglawfirm.com



March 21, 2019

VIA CERTIFIED MAIL RRR # 7016 0340 0000 8020 0913

Mr. David Eppler, Enforcement Officer Superfund Enforcement Assessment Section (6SF-TE) U.S. EPA, Region 6 1445 Ross Avenue Dallas, TX 75202-2733

Re: Request for Information for the F.J. Doyle Salvage Superfund Site (SSID 061D), Leonard, Fannin County, Texas 75452.

Dear Mr. Eppler:

In response to your February 15, 2019 letters addressed to Garland Power and Light ("GP&L") and Jeff English (collectively, "Respondents"), please find enclosed a combined response to the F.J. Doyle Salvage Superfund Site Information Request (the "Information Request").

After conducting a thorough and diligent search of records from various departments within the City of Garland ("the City") including GP&L, the City Health Department, the City Purchasing Department, the Office of the City Secretary, the City Financing Department, and the City Council; and after discussing the Information Request with current and former City employees; it is GP&L's and the City's belief that no records currently exist which indicate that the Respondents ever sold, supplied, sent, or disposed of materials or equipment with a PCB level of 50 ppm or greater to the F.J. Doyle Salvage Superfund Site ("the Site"), in accordance with 40 C.F.R. § 761.20.

In fact, by 1993, the City accomplished its goal of becoming PCB-free by removing and replacing each transformer in its electric utility with detectable PCB levels. However, prior to that time, the City had a policy in place whereby salvaged transformers with a <50 ppm PCB level were permitted to be sold, supplied, sent, or disposed of at salvage facilities, such as the Site at issue, in accordance with 40 C.F.R. § 761.20(c)(4).

The only locatable document responsive to the Information Request, attached hereto as "Attachment 1," is a 1987 data log for Transformer PCB testing. This document shows that the City conducted the requisite PCB tests on its transformers to ensure they were below the 50 ppm threshold before selling, supplying, sending, or disposing of them at the Site or elsewhere. Although a thorough and diligent search has already been conducted, if any further responsive documents are located, Respondents will timely supplement.

Mr. David Eppler March 21, 2019 Page 2

If you should have any questions regarding this response, please do not hesitate to contact my office.

Thank you,

Duncan C. Norton

Sincerely,

DCN/ldp

Enclosures

cc: Mike Betz, Deputy Attorney for the City of Garland Jeff English, Distributions Coordinator at GP&L

RESPONDENTS' COMBINED RESPONSE TO THE F. J. DOYLE SALVAGE SUPERFUND SITE INFORMATION REQUEST

This serves as the combined response of both Garland Power and Light ("GP&L") and Jeff English (collectively, "Respondents") to the U.S. Environmental Protection Agency, Region 6 letter, dated February 15, 2019, entitled, "F.J. Doyle Salvage Superfund Site Information Request" (the "Information Request").

Although Respondents have made a diligent and good-faith effort to respond to the requests set forth in the Information Request as fully and completely as practicable within the extremely short period of time provided, Respondents nonetheless respectfully set forth the objections stated in the attached Appendix A to preserve their rights. The responses below are based on the information available to Respondents as of the date of this response. As indicated below, some of the information requested in the Information Request is not currently available to Respondents, cannot be located, or does not exist. Accordingly, Respondents respectfully reserve the right to amend or supplement the responses below if and when additional information is received or located. Subject to, and without waiving such objections and reservations, Respondents answer as stated below. Each of the numbered items ("Requests") listed in the Information Request are set forth below, and Respondents' combined response to each such Request is provided below each such item in italics.

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.

ANSWER:

Garland Power & Light City of Garland P.O. Box 461508 Garland, Texas 75046-1508 972-205-3487

AND

Jeff English
Distributions Coordinator
Garland Power & Light
5306 Kara Lane
Allen, Texas 75002
972-205-3487

2. For each person answering these questions on behalf of the Respondent, provide full name, title, business address, business telephone and facsimile number.

ANSWER:

- a) John Teel
 Former Assistant Director of Health for the City of Garland
 9010 Chimneywood Drive
 Rowlett, TX 75089
 214-578-3391
- b) Jason Chessher Current Director of Health for the City of Garland 1720 Commerce St. Garland, TX 75040 972-205-3534
- c) Darrell Cline Chief Financial Officer at Garland Power & Light 217 North 5th St. Garland, TX 75040 972-205-2650

d) Mike Betz
Deputy Garland City Attorney
200 N. 5th St.
Garland, TX 75040
972-205-2380

e) Jeff English Distributions Coordinator at Garland Power & Light 217 North 5th St. Garland, TX 75040 972-205-2650

f) Duncan C. Norton Lloyd Gosselink Rochelle & Townsend, P.C. 816 Congress Ave., Suite 1900 Austin, TX 78701 512-322-5800 512-472-0532

g) Samuel L. Ballard Lloyd Gosselink Rochelle & Townsend, P.C. 816 Congress Ave., Suite 1900 Austin, TX 78701 512-322-5800 512-472-0532

3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, and facsimile number.

ANSWER:

Duncan C. Norton
Samuel L. Ballard
Lloyd Gosselink Rochelle & Townsend, P.C.
816 Congress Ave., Suite 1900
Austin, TX 78701
512-322-5800
512-472-0532

4. Has any material or equipment owned or used by Respondent ever been sold to, supplied to, or otherwise turned over to FJ Doyle for scrapping, salvage, repair, consignment, resale or any other purpose?

ANSWER:

Yes.

5. Has any material or equipment owned or used by Respondent ever been sent to the Site for scrapping, salvage, repair, consignment, resale, or any other purpose?

ANSWER:

Yes.

- 6. If your answer to either or both questions is yes, provide a complete list of all such material or equipment, as well as any and all shipments thereof; include the following information with your response:
 - a. The reason and approximate date(s) the material or equipment was taken out of service, and the date(s) sold, scrapped, disposed of, or otherwise turned over to FJ Doyle, or the date sent to the Site, if applicable.

ANSWER:

Please see "Attachment 1" produced in response, which indicates the following:

- (1) the dates on which GP&L declared the transformers as salvage (see "DATE SALVAGED" column);
- (2) the dates on which the transformers were tested for PCBs (see "DATE SAMPLED" column); and
- (3) the dates on which the transformers were sold to FJ Doyle (see "METHOD OF DISPOSAL" column).
- b. Describe the condition of the material or equipment when it was sold, scrapped, disposed of, or otherwise turned over to FJ Doyle, or sent to the Site, if applicable.

ANSWER:

Respondents currently lack sufficient information to accurately respond to this Request, but will timely supplement if any responsive information becomes available. Presently, respondents can only respond that, on information and belief, the transformers that were sold to FJ Doyle were irreparable and thus, salvageable.

c. List any amount of money paid or received by Respondent in relation to the sale, transfer, or delivery of the material or equipment. Indicate whether the price was reduced because of the inclusion of hazardous substances in the material or equipment.

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.

d. For each item of material or equipment, indicate whether it contained any oil when turned over to FJ Doyle. Supply any and all records that may indicate the contents

of the oil, in particular whether the oil may have contained any PCBs. Indicate what steps were taken to determine whether the oil contained any PCBs at the time of taking out of service or of disposal, and explain what precautions were taken to ensure that any PCBs in the equipment were disposed of properly.

ANSWER:

Please see "Attachment 1" produced in response. On information and belief, the transformers sold to FJ Doyle from July to December of 1987 contained some amount oil. According to "Attachment 1," none of these transformers contained PCBs at a level of 50 ppm or greater.

The City of Garland Health Department conducted multiple tests to ensure that the transformers did not contain PCBs at a level of 50 ppm or greater before selling said transformers to FJ Doyle. Specifically, the Health Department would conduct a Chlor-N Oil test on the oil contained in the transformer. The Health Department would then run an EPA-approved laboratory test on the sample to verify that the oil did not contain PCBs at a level of 50 ppm or greater. Once verified, the transformers were authorized to be sold to FJ Doyle. With regard to the transformers which contained PCB levels at 50 ppm or greater, to the best of Respondents' knowledge, such equipment was properly disposed of at an EPA-approved site. This is evidenced by the manifest designations under the Method of Disposal column on "Attachment 1."

e. Supply all documents pertaining to the transaction, and to the movement or shipment of the material or equipment from your property, or from property where you operate.

ANSWER:

Please see "Attachment 1" produced in response, which indicates the date on which the transformers were sold to FJ Doyle.

f. For each instance of equipment or material turned over to FJ Doyle or sent to the Site, indicate whether the equipment or material was transported by FJ Doyle, or by a separate company. In the case of the latter, identify both the individual and the company supplying the transportation services.

ANSWER:

On information and belief, Respondents never physically transported the transformers identified in "Attachment 1." Rather, F.J. Doyle arranged for the equipment to be picked up by flat-bed trucks from the City of Garland Salvage Yard.

g. Identify all persons who controlled and/or transported the material or equipment prior to delivery to the Site. Include job title, duties, dates performing those duties,

supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination.

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.

h. Provide the correct name and addresses of Respondent's plants and other facilities from which Respondent sold or supplied equipment or material to FJ Doyle or otherwise sent equipment or material to the Site.

ANSWER:

None to Respondents' knowledge. To the best of Respondents' knowledge, the only department in the City of Garland involved in selling the transformers was Garland Power & Light.

i. Provide a brief description of the nature of Respondent's operations at each plant or facility referenced above, including: the date such operations commenced and concluded; and types of work performed at each plant or facility, including but not limited to the industrial, chemical, or institutional processes and treatments undertaken at each plant or facility.

ANSWER:

Not applicable.

7. List, describe, and provide all documents relating to the information requested above. If any such documents have been destroyed, provide the dates of destruction.

ANSWER:

Please see "Attachment 1" produced in response, which is a 1987 data log for GP&L's Transformer PCB testing.

- 8. Did Respondent ever sell or supply transformers or any other oil-containing equipment to FJ Doyle or otherwise send transformers or any other oil-containing electrical equipment to the Site? If so, provide the following details for each item that was sold or supplied to FJ Doyle or may have been sent to the Site:
 - a. the name of the manufacturer and serial number;

ANSWER:

Please see "Attachment 1" produced in response. The column labeled, "MFG." lists the manufacturer name or abbreviation and the column labeled "SERIAL NO." lists the serial number of the salvaged transformers.

b. the quantity of oil contained in the equipment;

ANSWER:

Please see "Attachment 1" produced in response. The column labeled, "NAME-PLATE GALLONS" lists the estimated volume of each transformer, but does not necessarily indicate the quantity of oil contained therein when it was sold to FJ Doyle.

c. the concentration of PCBs contained in the oil;

ANSWER:

Please see "Attachment 1" produced in response. To the best of Respondents' knowledge, the following information is accurate although it concerns a document over thirty years old. As such, Respondents make no assurances that the following information is entirely accurate. Respondents lack any additional documentation or guidance that would shed light on the PCB testing methodology.

There are two relevant columns concerning PCB concentration. The column labeled "CLOR-N OIL RESULTS" identifies the PCB concentration identified during the initial Clor-N Oil test. The column labeled "LAB ANALYSIS" identifies the PCB concentration identified during the second EPA-approved laboratory test. Under this column, "c-1" means "composite sample 1." Composite samples were gathered from a number of various transformers, which the Clor-N Oil test initially identified as containing PCBs under 50 ppm. These composite samples were then re-tested in an EPA-approved laboratory setting for verification. However, if the Clor-N Oil test identified a sample with a PCB level at 50 ppm or above, the sample would be re-tested in the laboratory individually without a composite.

d. the purpose of the shipment (e.g, salvage, repair or resale);

ANSWER:

Please see "Attachment 1" produced in response. As indicated by the columns labeled "METHOD OF DISPOSAL" and "DATE SALVAGED," the transformers were first declared salvaged by GP&L and then sold to FJ Doyle.

e. the date on which the equipment left your facility;

ANSWER:

Please see "Attachment 1" produced in response; specifically, the column labeled "METHOD OF DISPOSAL."

f. the company name, address, and telephone number of the transporter; and

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.

g. the names, addresses, telephone numbers, and dates of ownership of any and all prior owners.

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.

9. Provide legible copies of any and all contracts, invoices, receipts, or other documents describing the transactions that Respondent implemented with FJ Doyle for each item identified in the question above.

ANSWER:

Please see "Attachment 1" produced in response.

10. Provide legible copies of any and all contracts, invoices, receipts, or other documents related to the transaction that Respondent implemented with transporters to transport the items in the question above.

ANSWER:

After a duly diligent investigation, Respondents believe that they do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

11. Describe how both PCB-contaminated oil and uncontaminated oil were emptied from electrical transformers and capacitors or other electrical equipment and stored at Respondent's facilities.

ANSWER:

To the best of Respondents' knowledge, oil was not emptied from the transformers at Respondents' facilities.

- 12. Identify and describe, and provide all documents that refer or relate to, the following:
 - a. How were hazardous substances or materials containing hazardous substances used or planned to be used at the Site?

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On

information and belief, Respondents were not involved in how any hazardous substances or materials were handled, used, or otherwise disposed of at the Site and thus, lack any knowledge responsive to this Request.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

b. What was done to any hazardous substances once they were sent to the Site, including any service, repair, recycling, treatment, or disposal?

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On information and belief, Respondents were not involved in how any hazardous substances or materials were handled, managed, or otherwise used at the Site and thus, lack any knowledge responsive to this Request. Respondents are only aware, according to "Attachment 1," that the transformers sold to FJ Doyle did not contain PCBs at a level of 50 ppm or greater.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

c. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On information and belief, Respondents were not involved in any activities or business practices directly at the Site, and thus, lack any knowledge responsive to this Request.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

d. How were hazardous substances typically used, handled, or disposed of at the Site?

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On information and belief, Respondents were not involved in how any hazardous

substances or materials were handled, used, or otherwise disposed of at the Site and thus, lack any knowledge responsive to this Request.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

e. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? When travelling to the Site, explain the details of the visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.

ANSWER:

On information and belief, neither Respondents, nor their agents, representatives, or employees, ever traveled to the Site. As such, no documents responsive to this particular Request exist.

f. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?

ANSWER:

On information and belief, Respondents only had knowledge about the substances contained in the transformers which the City of Garland sold to FJ Doyle; specifically, the transformers which contained a PCB level of less than 50 ppm. Respondents do not have particular knowledge about any hazardous substances that other individuals or entities may have disposed of at the Site.

Please see Attachment 1 produced in response, which demonstrates Respondents' knowledge of the particular substances sold to FJ Doyle.

g. Did Respondent have any influence over waste disposal activities at the Site? If so, how?

ANSWER:

To the best of Respondents' knowledge, no. As such, no documents responsive to this particular Request exist.

h. Did Respondent know if the owner(s) and/or operator(s) of the Site were removing a hazardous substance from the transferred material?

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. On information and belief, Respondents were not involved in how any hazardous

substances or materials were handled, used, or otherwise disposed of at the Site and thus, lack any knowledge responsive to this Request.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

i. Did Respondent know, based on general industry knowledge, if the hazardous substances would need to be removed from the transferred material in order for that material to be useful?

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

j. What percentage of Respondent's total hazardous substances went to the Site?

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

k. What steps did Respondent take to dispose of or treat any hazardous substances among the materials transferred to the Site? Provide any agreements and documents, including waste logs, journals, or notes, reflecting these steps.

ANSWER:

Please see "Attachment-1" produced in response, which demonstrates that the City of Garland conducted multiple PCBs tests on the transformers before selling them to FJ Doyle. Please see responses to Requests Nos. 6(d) and 8(c) for further information about these tests.

1. What involvement (if any) did Respondent have in selecting the particular means and method of disposal of the hazardous substances at the Site?

ANSWER:

To the best of Respondents' knowledge, Respondents did not have any involvement in selecting the particular means and method of disposal of the transformers it sold to FJ Doyle. As such, no documents responsive to this particular Request exist.

m. At the time Respondent transferred the materials containing hazardous substances to the Site, what did Respondent intend to happen to the hazardous substances? Provide any agreements and documents, including waste logs, journals, or notes, reflecting the intention of the parties. If Respondent does not have such documents and/or materials, please so state.

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

n. With respect to all arrangements involving materials containing hazardous substances, at the time of the arrangement, specify the measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owners/operators at the Site regarding the proper handling and ultimate disposition of the materials Respondent sent there?

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

o. What efforts, if any, did Respondent take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering (e.g., for repair, consignment, or joint-venture), disposing of, or arranging for the treatment or disposal of any hazardous substances.

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available.

In addition, Respondents do not have any responsive documents in their possession, custody, or control, or such documents do not exist or no longer exist. If any responsive documents become available, Respondents will timely supplement.

p. How long did Respondent have a relationship with the owner(s) and/or operator(s) of the Site?

ANSWER:

Respondents currently lack sufficient information to respond to this Request, but will timely supplement if any responsive information becomes available. Respondents are only aware that the City of Garland sold transformers to FJ Doyle from approximately July to December of 1987.

Please see "Attachment 1" produced in response.

q. Provide names, addresses, telephone numbers, and email addresses of any individuals, including former and current employees, who may be knowledgeable of Respondent's operations and practices concerning the handling, storage and disposal of hazardous substances at the Site.

ANSWER:

John Teel
Former Assistant Director of Health for the City of Garland
214-578-3391
dandjteel@msn.com

13. If any documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ANSWER:

To the best of Respondents' knowledge, no further responsive documents are available as the documents sought, to the extent any ever existed, date back some thirty years and may have not been retained.

14. If you believe there may be any person(s) able to provide a more detailed or complete response to any of the preceding questions and/or sub-questions or any person(s) who may be able to provide additional responsive documents, please identify such person(s) and the additional information you believe they may have.

ANSWER:

None.

APPENDIX A

Objections

General Objection No. 1: Respondents object to the EPA Information Request to the extent that it exceeds the authority granted to the U.S. Environmental Protection Agency under Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. §9604(e).

As provided in Section 104(e)(1) of CERCLA, 42 U.S.C. §9604(e)(1), the "authority of this subsection [Section 104(e)] may be exercised only for the purposes of determining the need for response, or choosing or taking any response action under this subchapter, or otherwise enforcing the provisions of this subchapter." Since Section 104(e) may only be invoked for these purposes, a necessary predicate for the invocation of Section 104(e) information request authority is that there be a release or threatened release of hazardous substances, or pollutants or contaminants that present an imminent and substantial danger to public health or welfare, subject to CERCLA enforcement authority. EPA's broadside information request, which purports to seek information concerning "any material or equipment owned or used by Respondent...sold to, supplied to, or otherwise turned over to FJ Doyle" (irrespective of whether there has been any release or threatened release of hazardous substances, or of pollutants or contaminants that present an imminent and substantial danger, at such facilities), exceeds the agency's CERCLA Section 104(e) authority. Moreover, the "subchapter" referred to in §104(e)(1) is Subchapter 1 of 42 U.S.C. Chapter 103, comprising 42 U.S.C. §§9601-9628, relating to the response to releases and threatened releases. Section 104(e) does not authorize use of the information request procedures contained in Section 104(e)(2) for other purposes, such as investigating potential compliance with other federal, state or local environmental laws or regulations.

General Objection No. 2: Respondents object to the EPA Information Request to the extent that it seeks information not relevant to the purposes stated in the U.S. EPA's letters dated February 15, 2019, CERCLA Section 104(e).

General Objection No. 3: Respondents object to the EPA Information Request as unreasonable and unduly burdensome to the extent that it seeks information and documentation dating back over thirty years, which may no longer exist. General Objection No. 4: Respondents object to the EPA Information Request as overly broad and not reasonably limited in time or scope.

General Objection No. 4: Respondents specifically object to the EPA Information Request improperly addressed to Jeff English as the purported Chief Executive Officer (CEO) of Garland Power & Light. Jeff English is a Distributions Coordinator for GP&L whereas Jeff Janky is the CEO.

Objection to Request Nos. 4 and 5: In addition to the General Objections set forth above, Respondents object to Request Nos. 4 and 5 to the extent that such Requests incorporate an overly-broad definition of "Material," without limitation, to encompass "any and all objects, goods, products, by-products, substances, or matter of any kind, including but not limited to wastes." Such a vague and overly-broad definition seeks to capture material that has nothing to do with the purported purpose of the Information Request (i.e. information pertaining to PCB-contaminated materials disposed of at FJ Doyle).

Objection to Request No. 6.b.: In addition to the General Objections set forth above, Respondents object to Request No. 6.b. because such Request contains an undefined and ambiguous term, "condition of the material or equipment."

Objection to Request Nos. 6.h. and 6.i. In addition to the General Objections set forth above, Respondents object to Request Nos. 6.h. and 6.i. because such Requests contain an undefined and ambiguous term, "Respondent's plant(s)."

ATTACHMENT 1

TRANSFORMER PCB STALE RESULTS

فنندا							للبرور المحارب وا	يستنبي بساؤه			****	
SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM NO.	NAME PLATE GALLONS	DATE SAMPLED	PERSON SAMPLING	CIOR-N OIL RESUL/IS	lab Analysi		DATE SALVAGED
50	75	Esco	2320	202 1471	175-102	EST 30	7-16-87	HUCKABY BROCK	< 50	C-1 8.0	FS DOYLE	1 - 1 / 1
51	75	RTE	8369	711052373	175-003	34	7-16-87	1.AVENDER	450	C-3	SOLD 8/3/37 FIDOYLE	5/11/87
52	25	RTE	4908	5311.918	175-065	13	7-16-87	Нискаву	L < 50	8.D	SELD 8/13/87 FJ DOYLE	5/11/87
53	25	Eseo	3389	11233813	175-070	EST30	7-16-87	Huckaby	450	C-1	SOLU Eliakad FJ DOYLE	5/11/81
54	25	RTE	4450	4307279	175-170	13	7-16-87	Huckaby	450		SOLD S/13/87 FJ DOYLE	2/12/87
55	10	Esco	1961	2021421	175-048	EST 30	7-16-87	BROCK	> 50	1.6	50LD 8/13/87 FJ DOYLE	5/14/89
56	75	RHAE	12345	73110368	175-003	50	7-16-87	Huckaby	250	c-3	SOLD 8/13/87 FJ DOYLE	5/15/81
57	50	RHIE	3899	3306135	115-095	18	7-16-87	HUCKABY	250	8.0	SOLD 8/13/87 FJ Doy LE	5/18/87
58	31.5	Esco	2288	2021455	175-084	EST34	7-14-87	TEEL	>50	1.6		5/18/87
59	15	Esca	2119	6022912	175-170	E6720	7-16-87	TEEL	>50	3,4	ecd 8/13/87	5/18/87
60	15	Esco	2821	9129335	175-056	E57 20	7-16-87	TEEL	750	3.3		5/18/87
61	37.5	Esco	3382	11233830	175-084	EST 30	7-16-87	Brock.	450	8.0		5/18/87
62		Esco	2636	6127876	175-180	EST 30	7-16-87	114010-1	250	2.1	EJ Doyle:	-/18/87
63	50	Eoco	25/6	5/27274	175-095	EST 40	7-16-87			OIL	ELD 8/13/87	1/3/87
W		RH8	7459	701014695	175-004	. 23	7-16-87	TEEL C	50	2.1	J DOYLE	7/18/87
65	167	v.t.	18901	7341659	115-125	89	7-17-87	LANEUDER		7.0	OLD 8/13/13 T DOYLE	5/19/81
660	31.5		2178	6022 946	175-195				250	8.0	5 DOYLE	5/21/87
61	10	W.H.	1212	51014323	175-160	EST 10	7-16-87	BROCK	750	38	OLD 8/13/87 EJ DOYLE	5/21/87
	, ¥.	same of		in the same of the same			1	. 1				

TRANSFORMER	PCB	TPTAR.	RESULTS

Acres 2.42

SAL NO. SERIAL NO. SERIAL NO. TIEM NO. NAME - DATE FRANCE SALURES SALU	-	<u>.</u>		100	<u> </u>									
69 25 Cock 2631 6127871 175-180 155 30 7-16.87 BABER 250 3.0 151 Device 5/26/187 175-124 51 7-16.87 BABER 2650 3.0 151 Device 5/26/187 175 Device			MFG.	CITY NO.	SERIAL NO.	ITEM NO.	PLATE	RAMPI.RO		OIL	ANAT.VC1	METHOD OF DISPOSAL		,T
10 10 lone 3472 2334324 175-049 EST 8 7-16-87 TEEL 250 1.7 ET DOYLE 5/20/17 70 10 lone 3472 2334324 175-049 EST 8 7-16-87 TEEL 250 80 EST SOTO 5/20/17 71 37.5 lone 802 678 191 175-080 EST 30 7-16-87 HULLAGY 250 8.0 EST SOTO 6/20/17 72 37.5 lone 3208 8232 752 175-195 EST 30 7-16-87 HULLAGY 250 8.0 EST DOYLE 5/20/17 73 100 RTLE 6190 68101389 175-006 42 7-16-87 HULLAGY 250 1.7 EST DOYLE 5/20/17 74 50 lone 3677 4334831 175-095 EST 40 7-16-87 TEEL 250 1.7 EST DOYLE 5/20/19 75 50 RTLE 12720 742001925 175-004 30 7-16-87 BROCK 250 2.1 EST DOYLE 6/4/87 76 50 RTLE 4412 3310341 175-195 19 7-16-87 BROCK 250 2.1 EST DOYLE 6/4/87 77 125 RTLE 4192 4302152 175-181 13 7-16-87 HULLAGY 250 2.1 EST DOYLE 6/187 78 18 1928 111026147 175-195 EST 30 7-16-87 HULLAGY 250 2.1 EST DOYLE 6/187 79 37.5 lone 269 2696 5127634 175-195 EST 30 7-16-87 HULLAGY 250 2.1 EST DOYLE 6/187 80 37.5 lone 343 6023014 175-195 EST 30 7-16-87 HULLAGY 250 2.1 EST DOYLE 6/187 80 37.5 lone 2696 5127634 175-195 EST 30 7-16-87 HULLAGY 250 2.1 EST DOYLE 6/187 80 37.5 lone 343 6023014 175-195 EST 30 7-16-87 HULLAGY 250 2.1 EST DOYLE 6/187 80 37.5 lone 2696 5127634 175-195 EST 30 7-16-87 HULLAGY 250 2.1 EST DOYLE 6/187 80 37.5 lone 343 6023014 175-095 18 7-16-87 HULLAGY 250 2.1 EST DOYLE 6/187 80 87.5 lone 343 6023014 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE 6/187 80 87.5 lone 343 6023014 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE 6/187 80 87.5 lone 343 6023014 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE 6/187 80 87.5 lone 343 6023014 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE 6/187 80 87.5 lone 343 6023014 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE 6/187 81 50 87.5 lone 1939 2021462 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE 6/187 82 50 87.5 lone 1939 2021462 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE 6/187 83 50 87.5 lone 1939 2021462 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE 6/187 84 50 800 1939 2021462 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE 6/187 85 50 800 1939 2021462 175-095 18 7-16-87 HULLAGY 250 1.3 EST DOYLE	68	25	Esca	2631	6127871	175-180	EST 30	7-16-87		.250	C-18.0	3	5/26/87	I
70 10 10 10 10 10 10 10 10 10 10 10 10 10	69	167	V. +.	11043	734449	175-124	51	7-16-87	LAVENDER	<< 50	1.7	FIDOYLE		
72 37.5 Cace 3208 8232752 175-080 EST 30 7-16-87 HUCKERY L 50 Set D 819/37 175 Cace 3208 8232752 175-195 EST 30 7-16-87 TEEL L 50 Set D 819/37 175 D 94E 5/20/27 175 D 94E 5/2	20	10.	Esna	3472	2334324	175-049	EST 8	7-16-87	TEEL	450		FJ DOYLE	5/27/87	L
72 37.5 Cace 3208 8232752 75-195 EST 30 7-16-87 TEEL 250 1.7 EJ DOYLE 561/27 73 100 R+& 6190 681011389 75-006 42 7-16-87 TEEL 250 1.7 EJ DOYLE 5/20/27 74 50 Rec 3677 4334831 75-095 EST 40 7-16-87 TEEL 250 1.7 EJ DOYLE 6/1/87 75 R+& 1270 742001925 75-004 30 7-16-87 TEEL 250 2.1 EJ DOYLE 6/1/87 76 SD R+& 1270 742001925 75-004 30 7-16-87 TEEL 250 2.1 EJ DOYLE 6/1/87 77 SD R+& 1442 331034/ 75-195 19 7-16-87 Block 250 2.1 EJ DOYLE 6/1/87 78 ST R+& 1492 4302152 15-181 13 7-16-87 HULKASY 250 2.1 EJ DOYLE 6/1/87 79 37.5 Coco 2343 6023014 75-003 34 7-16-87 HULKASY 250 2.1 EJ DOYLE 6/1/87 79 37.5 Coco 2496 5127634 75-095 EST 30 7-8-87 TEEL 250 14 Socia 810/87 14 Socia 810/87 14 Socia 810/87 14 Socia 810/87 15 DOYLE 6/1/87 79 50 R+& 4/05 3308449 75-095 18 7-16-87 LANGUARSY 750 14 EJ DOYLE 6/1/87 79 50 R+& 4/07 3308441 75-095 18 7-16-87 LANGUARSY 250 1.7 EJ DOYLE 6/1/87 79 50 Socia 8-30566 75-085 EST 40 7-16-87 LANGUARSY 250 2.1 EJ DOYLE 6/1/87 70 10 Socia 8-30566 75-085 EST 40 7-16-87 LANGUARSY 250 2.2 Socia 810/87 2.2 Socia 810	21	37.5	Roca	802	678 191	175-080	EST30	7-16-87	Huckaby	L 50		FJ DOYLE	5/27/87	
73 100 1878 6190 681071389 175-006 42 7-16.87 HUCKAGY 250 1.7 FT DEVIE 5/20/187 74 50 Bocs 3677 4334831 175-095 EST 40 7-16.87 TEEL 250 C-1 SECD 8/18/187 75 0 R+6 E 12700 742001925 175-004 30 7-16.87 LAUGHDEN 250 2.1 FT DEVIE 6/18/87 76 50 R+6 E 12700 742001925 175-004 30 7-16.87 EBOCK 250 2.1 FT DEVIE 6/18/87 71 25 R+6 E 44/12 33/1034/ 175-95 19 7-16.87 HUCKAGY 250 2.1 FT DEVIE 6/18/87 71 25 R+6 1928 711026/147 175-003 34 7-16.87 HUCKAGY 250 2.1 FT DEVIE 6/18/87 79 37.5 Bocs 2696 5/27634 175-095 EST 30 7-8.87 TEEL 250 7 FT DEVIE 6/19/87 80 37.5 Bocs 2696 5/27634 175-095 EST 30 7-16.87 HUCKAGY 750 14 FT DEVIE 6/19/87 81 50 R+6 4/07 3308481 175-095 18 7-16.87 HUCKAGY 750 16 FT DEVIE 6/19/87 82 50 R+6 4/07 3308481 175-095 18 7-16.87 HUCKAGY 750 16 FT DEVIE 6/19/87 83 50 R+6 4/07 3308481 175-095 18 7-16.87 HUCKAGY 750 16 FT DEVIE 6/19/87 84 50 Bocs 1939 2021462 175-095 EST 40 7-16.87 LAUGHDEN 750 92 17/2/37/87 6/20/87 84 50 Bocs 1939 2021462 175-095 24 7-16.87 LAUGHDEN 750 92 17/2/37/87 6/20/87	12	37.5	Esca	3208	8232752	175-195	EST 30	7-16-87	TEEL	150	1.7	FJDOYLE	belos	
15 50 R+6	13	106	Rtse	6190	681071389	175-006	42	7-16-87	Huclaby		1.7	FJ DOYLE	5/29/81	
15 50 R+6E 1270 74201925 175-004 30 7-16-87 LAURDON 2650 2.1 FJ DOYLE 6/4/87 76 50 R+8E 4412 3310341 175-195 18 7-16-87 BROCK 650 2.1 FJ DOYLE 6/8/87 17 25 R+8E 4412 4302152 175-191 13 7-16-87 HUCKHBY 650 2.1 FJ DOYLE 6/9/87 18 75 R+8E 1928 711026147 175-003 34 7-16-87 LAURDON 650 2.1 FJ DOYLE 6/9/87 19 37.5 Ecc 2496 5127634 175-195 EST 30 7-8-87 TEEL 650 7 18 75 R+8E 4105 3308449 175-095 18 7-16-87 LAURDON 750 14 FJ DOYLE 6/19/87 18 50 R+8E 4107 3308481 175-095 18 7-16-87 LAURDON 750 16 FJ DOYLE 6/19/87 19 50 B.E. 663 B.370566 175-085 EST 40 7-16-87 LAURDON 750 92 12/27/87 6/23/87 19 50 Ecc 1939 2021462 175-095 24 7-16-87 LAURDON 750 92 12/27/87 6/23/87 19 50 Ecc 1939 2021462 175-095 24 7-16-87 LAURDON 750 16 FJ DOYLE 6/24/87	74	50	Esco	3677	4334831	175-095	EST 40	7-16-87	TEEL	150	C-18.0	SOLD 8/13/137 FJ DOYLE	6/1/87	
76 50 RTBE 4412 3310341 175-195 19 7-16-87 BROCK 250 2.1 F5 DOYLE 6/8/87 17 25 RTBE 4412 4302152 175-181 13 7-16-87 HUCKABY <50 2.1 F5 DOYLE 6/8/87 18 75 RTBE 1928 711026147 175-003 34 7-16-87 LAUFENDER <50 2.1 F5 DOYLE 6/19/87 19 37.5 Rock 2696 5127634 175-195 EST 30 7-8-87 TEEL <50 7 R5 DOYLE 6/19/87 18 50 RTBE 4105 3308 449 175-095 18 7-16-87 LAUFENDER 750 166 F5 DOYLE 6/19/87 18 50 RTBE 4107 3308 449 175-095 18 7-16-87 LAUFENDER <50 1.7 F5 DOYLE 6/19/87 18 50 RTBE 4107 3308 449 175-095 18 7-16-87 LAUFENDER >50 92 MAPIFE 51 SOYLE 6/19/87 18 50 RTBE 4107 3308 449 175-095 18 7-16-87 LAUFENDER >50 92 MAPIFE 51 SOYLE 6/19/87 18 50 RTBE 4107 3308 440 175-095 18 7-16-87 LAUFENDER >50 92 MAPIFE 51 SOYLE 6/19/87 18 50 Sec 1939 2021462 175-095 24 7-16-87 LAUFENDER >50 92 MAPIFE 51 SOYLE 6/19/87 18 50 R0	15	50	RHGE	12770	742001925	175-004	30	7-16-87	LAUEODEA	2250	2.1	FJ DOYLE	6/4/87	•
17 25 RTLE 4192 4302152 175-181 13 7-16-87 HUCKHBY <50 2.1 FT DOYLE 6/19/87 18 75 RTLE 1928 711026147 175-003 34 7-16-87 LAVENDER <50 2.1 FT DOYLE 6/19/87 19 37.5 Edge 2343 6023014 175-195 EST 30 7-8-87 TEEL <50 7 SOLD 8/13/87 6/19/87 80 37.5 Edge 2696 5127634 175-195 EST 30 7-16-87 HUCKHBY 750 14 FT DOYLE 6/19/87 81 50 RTLE 4/05 3308449 175-095 18 7-16-87 LAVENDER 750 1.6 FT DOYLE 6/19/87 82 50 RTLE 4/07 3308451 175-095 18 7-16-87 LAVENDER 750 1.7 FJ DOYLE 6/19/87 83 50 S.E. 663 8-370566 175-085 EST 40 7-16-87 LAVENDER 750 92 MAP 15 EST 76/23/87 84 50 Edge 1939 2021462 175-095 24 7-16-87 TEEL <50 2.1 FJ DOYLE 6/24/87 84 50 Edge 1939 2021462 175-095 24 7-16-87 TEEL <50 2.1 FJ DOYLE 6/24/87	76	50	Rtoe	4412	3310341	175-195	18	7-16-87	Brock	250	2.1	FJ DOYLE	6/8/87	
78 75 R+E 7928 711026147 175-003 34 7-16-87 LAURIDER < 50 2.1 FI DOYLE 6/19/87 19 37.5 Eggs 2343 6023014 175-A5 EST 30 7-8-87 TEEL < 50 7 FI DOYLE 6/19/87 80 37.5 Eggs 2696 5127634 175-195 EST 30 7-16-87 HUCKHBY 750 14 SECL 810/87 84 50 R+E 4105 3308449 175-095 18 7-16-87 LAURIDER 750 1-6 FI DOYLE 6/19/87 85 50 R+E 4107 3308451 175-095 18 7-16-87 LAURIDER 750 1-7 FI DOYLE 6/19/87 85 50 R+E 4107 3308451 175-095 18 7-16-87 LAURIDER 750 92 1-7 To DOYLE 6/19/87 87 50 8-20 8-370566 175-085 EST 40 7-16-87 LAURIDER 750 92 12/27/87 6/23/87 8 88 50 Eggs 1939 2021462 175-095 24 7-16-87 LAURIDER 750 92 12/27/87 6/23/87 8	11	25	RTLE	4192	4302152	175-181	13	7-16-87	Huckaby	250	2.1	FJ DOYLE	/n/87	
19 37.5 Cocs 2696 5127634 175-195 EST 30 7-8-87 TEEL 450 ? FJ Deyle 6/19/87 80 37.5 Cocs 2696 5127634 175-195 EST 30 7-16-87 HUCKHEY 750 14 FJ Deyle 6/19/87 84 50 R+E 4/05 3308449 175-095 18 7-16-87 LAVEWER 750 1.6 FJ Deyle 6/19/87 83 50 R+E 4/07 3308451 175-095 18 7-16-87 HUCKHEY 450 1.7 FJ Deyle 6/19/87 83 50 8.2. 663 8-370566 175-085 EST 40 7-16-87 LAVEWER 750 92 12/27/87 6/23/87 84 50 Eoco 1939 2021462 175-095 24 7-16-87 TEEL 450 2.1 FJ Deyle 6/24/87	18	15	RYEE	1928	711026147	125-003	34	7-16-87	LAUENDER	250	2./	FI DOYLE		
80 31.5 Each 3/6/34 175-195 EST 30 7-16-87 LAURUMEN 750 14 SELA 8/13/87 FX DOYLE 6/19/87 82 50 R+E 4/05 3308449 175-095 18 7-16-87 LAURUMEN 750 1.6 FT DOYLE 6/19/87 82 50 R+E 4/07 3308451 175-095 18 7-16-87 HUCKABY 650 1.7 FT DOYLE 6/19/17 83 50 8.8. 663 8.370566 175-085 EST 40 7-16-87 LAURUMEN 750 92 MADIFE ST 6/23/87 84 50 800 1939 3021462 175-095 24 7-16-87 TEEL 650 301 FT DOYLE 6/24/87 84 50 800 801/87 8			Esco	2343	6023014	175-195	EST 30	7-8-87	TEEL	L50	- 1	FJ DEYLE	119/87	<u> </u>
84 50 R+E 4/05 3308449 175-095 18 7-16-87 LAVENDER 750 1.6 FJ DOYLE 6/19/87 82 50 R+E 4/07 3308451 175-095 18 7-16-87 HOCKABY <50 1.7 FJ DOYLE 4/19/17 83 50 X.E. 663 8-370566 175-085 EST 40 7-16-87 LANENDER >50 92 MANUFEEST 4/12/27/87 6/23/87 8 84 50 Each 1939 2021462 175-095 24 7-16-87 TEEL <50 2.0 FJ DOYLE 6/24/87	1 -		Eocs	2696	5127634	175-195	EST 30	7-46-87	HUCKHBY	750	14	FT DOYLE	119/87	
82 50 R+6E 4/07 3308451 175-095 18 7-16-87 HUCKABY <50 1.7 FJ DOYLE 4/9/37 83 50 D.E. 663 B-370566 175-085 EST 40 7-16-87 LAURDDER >50 92 MAD 15 EST 6/23/87 8/9/35 57 84 50 Each 1939 2021462 175-095 24 7-16-87 TEEL <50 2.1 FJ DOYLE 6/24/87			R+4E	4105	3308449	175-095	18	7-16-87	LAVENDER		106 1	J DOYLE	6/19/8	
83 50 \$1.8. 663 \$-370566 175-085 EST 40 7-16-87 LAURDON >50 92 \$\frac{12\frac{12}{12\frac{12}{12}}}{12\frac{127}{87}} \frac{6\frac{12}{87}}{6\frac{12}{87}} \frac{12\frac{12}{87}}{12\frac{127}{87}} \frac{6\frac{12}{87}}{12\frac{127}{87}} \frac{12}{87} \	82	50	RHE	4107	3308451	175-095	18	7-16-87	HUCKABY	L50 C	1.7 F	J DOYLE	119/87	
84 50 Esco 1939 2021462 175-095 24 7-16-87 TEEL < 50 2.1 FJ DOYLE 6/24/87	-		¥.2.	663	B-370566	175-085	EST 40	7-16-87	LAUTADER		14	12/27/87	6/23/87	PCE
(-2 500 8/3/8)				1939	2021462	175-095	24	7-16-87	TEEL	250	2.1 F	J DOYLE		
					3307 845	175-095	18	7-16-87	LAVENDER	450	2.1	FJ DOYLE	1/2/87	
						l		- 1	.		.]			

TRANSFORMER	PCB	PIE	RESULTS	

	4		بير د ⁴⁴ اۋ - بير	TRANS	FORMER PCB	PLE R	esults					,	
SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM NO.	NAME _ PLATE- GALLONS	DATE SAMPLED	PERSON SAMPLIN		lab Analysi	METHOD OF S DISPOSAL	DATE SALVAGE	D
86	37.5	RHE	3790	3305 721	175-195	EST 30	7-16-87	BROCK	150	C -3		7-1-89	I
87		RtSE	12630	74/007337	175-003	34	7-16.87	TEEL	LL 50	2-3	SOLD 8/13/87 FJ DOYLE	7-1-87	L
	50	Esco	3624	4334907	175-195	E5740	7-16-87	Huckaby	450	_ ~ .	SOLD 8/13/87 FJ Doyle	7-1-87	Γ
	250		6539	5014113	175-134				>50	5.6		74-87	
90	100	Rtse	6195	681071388	175-006.	42	7-16-87	LAVENDER	150	201 8	SOLD 8/13/87 T DOYLE	19/87	
91	5	Esca	1784	4916543	175-163	EST 3	7-16-87	Huckaby	750	10.7 F	FJ DOYLE	7/13/87	
92	500	w. H.	6987	708 H 10176	175-150	EST 80		TEEL	750	O. Z	1AU IFGOT \$7895 12/27/87	1/13/87	29
93	75	RHIE	12343	731100396	175-003			·		so	Comen	1/20/87.	,.
94	75	RT+ E	12 940	741050940	125.003					s.	olomon 7	12/87	
95	75	meguo	8248	5709330	175-001					5	comon 7	21/87	
96	37.5	RHIE	3924	3110367	175-195					56	LOMON 7	22/87	
97	31.5	RTLE	4500	4308945	175-195					Se	CLO MON /	4/87	_
98	37,5	ESCO	2597	5127631	175-195				(50	1	27/81	
		£500	2679	5127636	175-195					50	comos 7	18/87	
100	75	RTEE	8523	711059153	175-003						LONON 7/2	30/87	
				70PH10175						Me 127	101FEST 1635 27/87 7-	31-87 P	c B
102	25	RTEE	4443	4307212	175-180							3.07	
nzi.	50	RTSE	3838	3305768	175-201					50		487	-

TRANSFORMER	PCB	s	LE	RESULTS
-------------	-----	---	----	---------

THE RESIDENCE OF THE PARTY OF T

SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM	NO.	NAME _ PLATE - GALLONS	DATE SAMPLED	PERSON SAMPLIN	LOR-N OIL RESULTS	lab Analysis	METHOD OF DISPOSAL	DATE SALVAGED	T
42	75	RTE	C-7969	711032152			34	5-7-87	JT	comf \$1.		Doyle		T
33	100	RTE	c-4683	4309696			42	5-7-87	JT			1		
25	50	ESCO	c-2693	6127883			Est. 40	5-7-87	JT					
27	50	ESCO	c-2695	6127882			Est. 40	5-7-87	JT.					
26	50	E5C0	c-2694	6127881				5-7-87						
2	75	McGRAW-	C-12611	ZK521007				5-7-87						_
38	75	RTE	C-8396	711050703	·		34	5-7-87	TĽ		.01			
34	75	ALLIS-CH	C-7267	5333544		•	42	5-7-87	JT	C< 50 PP#		·		 ,
49	37,5	E5CO	C-2083	202 525			EST 34	5-7-87	JT					
11	37.5	ESCO	C-2279	6022950			Es+ 30	5-7-87	JT					
47	50	RTE	C-12848	741001864			34	5-7-87	JT					_
9	75	RTE	c-8624	711066442	•		34	5-7-87	JT.				·	
					······································									_
			,											
-			COMPOSITE	SAMPLE O	F (12)	77	ANSFO	RMER	S ABO	vE				_
			SAMPLE	#/)						CSOIPM				
一														

TRANSFORMER PCB \ \ \text{LE RESULTS}

			100 1 15 C. C.									
SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM NO.	NAME _ PLATE GALLONS	DATE SAMPLED	PERSON SAMPLIN	IOR-N OIL RESULTS	lab Analysi	METHOD OF DISPOSAL	DATE SALVAGED
46	25	E5C0	C-1955	2021093		EsT. 30	5-7-87	JT	COMPAS	1	Doyle	
44	25	E5C0	C-2951	2230706		Est. 30	5-7-87	JT.			1	
45	15	RTE	c-3699	3304870		12	5-7-87	JL			·	
37	. 50	RTE	C-7634	701077107		23	5-7-87	リ だ	250 Mm			
7	100	ESCO	c-2885	12/30/26		Est. 40	5-7-87	٦٢		0,61		
28	167	ESCO	C-2389	1126038		64	5-7-87	JT		7		
29	167	ESCO	C-3402	12233979		56		, ,				
30	167	ESCO .	C-3399	12233976		56	5-7-87	· JT			·	
12	75	RTE	C-4216	33/1/89		30	5-7-87	JT				
43	25	ESCO	C-3437	1334139		EST 30	5-7-87	JT	1			
							·				1	
			COM POSI	E SAMPLE O	VF (10) T	RANSF	OKMER	ABG	IE		:	
			SAMPLE	<i>¥</i> 2)					250 Mm			
_												
_		•	 								-	
_												
					l				<u> </u>			

TRANSFORMER PCB S. LE RESULTS

			and with apply.	L							•	
SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM NO.	NAME _ PLATE- GALLONS	DATE SAMPLED	PERSON SAMPLIN	IOR—N OTI RESULTS	lab Analysi	METHOD OF DISPOSAL	DATE SALVAGED
8	15	ESCO	C-1933	202/079		Est 23	5-7-87	JT	750HA	2.41	Doyle	
1	50	RTE	C-7556	701074698		23	5-7-87	JT	COMP#34		1	
15	15	ESCO	C-2068	4022196		Est 20	5-7-87	JT	comf# JA			
14	37.5	MOLDNEY	c-908	1500219		251/2	5-7-87	JT.	comp #3A			
32	75	Megraw	C-12563	73ZK521003		Est 40	5-7-87	JT	iomp#3A	.9¢:		
19	10	Westingh	C-1221	57F 5031		Est 10	5-7-87	11	comp #3A			
6	25	RTE	C-4454	4307283		/3	5-7-87	JT	compa 3 A			
13	25	RTE	C-4153	4302113		12	5-7-87	11	10mp#3.f		\(\frac{1}{2} \)	
22	50	Westruph	C-5646	48B8988		Est 40	5-7-87	TL	750 MA	16.93	MAPIFEST # 70 85 12/17/87	
31	-	-	-	_		EST. 40	5-7-87	JT	>50 PPM	24.99	Doyle	
			COMPOSIT	E SAMPLE C	-(10) TA	ANSFO	RMERS	ABO	UE			
			SAMPLE	<u>#3</u>)			`		5011M			
				SAMPLE OF		AUSFO	e mers	ABO	E			
			SHMALE !	#3A) 7 Clean	Trans					<u> </u>	:	
									-			
-1				1			ı	į	1		· ·	

TRANSFORMER PCB PLE RESULTS

SAL NO.	KVA	MFG.	CITY NO.	SERIAL NO.	ITEM		NAME _ PLATE GALLONS	DATE SAMPLED	PERSON SAMPLIN	CLOR—N OIL RESULTS	lab Analysi	METHOD OF DISPOSAL	DATE SALVAGED
36	75	CHANCE	C-8882	72A58998			-	5-8-87	BF	RESULTS COMP #5A 250	it.	7. Donle	
10	50	VANTRAN	C-10623	73V 48 0 5			51	5-8-87		cem4 # 5 A 2 50	7.52		
40	500	G.E.	C-8733	J933206T72AA			180	5-8-87	BF	Comf # 5A L 50	1		
41	500	WESTING H	C-4951	65K 4796				5-8-87	BF			Ţ	
21	300	G.E.	C-5128	F 635398-66P		,.	122	5-8-87	BF	750	181-)	MAUIFEST \$7035 12/27/87	
				·									
			COMPOSI	TE SAMPLE B	F(4)	TR	ansi=0	RMER,	ABO	DUE		•	
			SAMPLET	² 5A)						250 PPM			
		<u></u>											•
			,										
	·												
													







NEOPOST

FIRST-CLASS WALL



ZIP 78701 041M11283318

ity of Garland 3/25/19

First Class Mail First Class Mail



Sf-Te **EPA REGION 6**